

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ZAPFRAUD, INC.,

Plaintiff,

v.

PROOFPOINT, INC.

Defendant.

Civil Action No. 1:19-cv-01691-CFC

**JURY TRIAL DEMANDED**

**DECLARATION OF BJORN MARKUS JAKOBSSON  
IN SUPPORT OF ZAPFRAUD, INC.'S OPPOSITION TO  
PROOFPOINT, INC.'S MOTION TO TRANSFER VENUE**

I, Bjorn Markus Jakobsson, declare as follows:

1. I am the inventor of U.S. Patent No. 10,277,628, entitled "Detecting Phishing Attempts," and President of ZapFraud, Inc.
2. If asked to testify at trial in the above-captioned action, I am willing and able to travel to Delaware.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19th day of February 2020.



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Bjorn Markus Jakobsson